

Exhibit 1

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**MICHELLE M. TORREY**

**Plaintiff,**

**v.**

**CITY OF BROCKTON  
(A.K.A.) BROCKTON POLICE DEPT.  
OFFICER JOHN DOE INDIVIDUALLY  
AND IN HIS OFFICIAL CAPACITY  
UNITED STATES OF AMERICA  
(A.K.A.) FEDERAL BUREAU OF INVESTIGATION AGENTS OF UNITED STATES OF  
AMERICA  
SEVERAL JOHN DOE'S INDIVIDUALLY  
AND IN THEIR OFFICIAL CAPACITIES  
COMMONWEALTH OF MASSACHUSETTS  
(A.K.A.) MASSACHUSETTS STATE POLICE  
STATE TROOPER BRIAN RICHARD KILFOYLE INDIVIDUALLY  
AND IN HIS OFFICIAL CAPACITY  
SEVERAL JOHN DOE'S and JANE DOE'S INDIVIDUALLY  
AND IN THEIR OFFICIAL CAPACITIES**

**Defendants.**

**MOTION TO APPOINT COUNSEL**


Whereas, on 3/23/21 my home was illegally searched by law enforcement. My money was seized, however, a greater amount than what was reported as seized evidence was actually stolen along with other property. In addition to my 4th Amendment right being violated, my doors were breached and my windows were smashed. Due to this blatant theft and unlawful seizure, I do not have the funds required to hire an attorney. This action by law enforcement and the District Attorney to willfully violate my 5th Amendment right to due process has left myself, the claimant, in dire straights. The Government and/or their employees have violated the Equal

Access to Justice Act (E.A.J.A) 28 U.S.C.A. 2412(d)(1)(A) and 28 U.S.C.A. 2412 (d)(1)(A); Comprehensive Drug Abuse Prevention and Control Act of 1970 § 511, 21 U.S.C.A. § 881. The claimant has only a high school diploma and would be no match to defend herself against the United States Government, City of Brockton et al John and Jane Doe's arsenal of unlimited counsel.

Respectfully submitted,

MICHELLE M. TORREY,  
On behalf of herself,

Plaintiff,

 Michelle M. Torrey July 12, 2024

Michelle Torrey pro seau  
Signed under penalties  
of perjury

DATED: July 13, 2024